

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

MDL NO. 16-2738 (MAS) (RLS)

THIS DOCUMENT RELATES TO ALL CASES

CERTIFICATION OF MICHELLE A. PARFITT, ESQ.

Michelle A. Parfitt, Esq. hereby certifies as follows:

1. I am an attorney at law and senior partner at the law firm of Ashcraft & Gerel. I was appointed as Plaintiffs' Co-Lead Counsel to represent all Plaintiffs in the above-captioned matter.
2. I submit this Certification based on personal knowledge in support of the Plaintiffs' Steering Committee's Memorandum of Law in Opposition to Defendants Johnson & Johnson and LLT Management LLC's Motion to Exclude Plaintiffs' Experts' Opinions Regarding Alleged Heavy Metals and Fragrances in Johnson's Baby Powder and Shower to Shower.
3. Attached hereto as Exhibit 1 is a true and correct copy of IARC Monographs Volume 136, Questions & Answers (Q&A) (July 5, 2024).
4. Attached hereto as Exhibit 2 is a true and correct copy of Third

Amended Expert Report of Laura M. Plunkett, Ph.D., DABT, dated May 28, 2024.

5. Attached hereto as Exhibit 3 is a true and correct copy of IARC Monographs on Arsenic, Metals, Fibres, and Dusts: Volume 100 C, A Review of Human Carcinogens (2012), relevant excerpts (Introduction and Preamble).

6. Attached hereto as Exhibit 4 is a true and correct copy of relevant excerpts of IARC Monographs on Arsenic, Metals, Fibres, and Dusts: Volume 100 C, A Review of Human Carcinogens (2012) (Nickel).

7. Attached hereto as Exhibit 5 is a true and correct copy of relevant excerpts of IARC Monographs on Arsenic, Metals, Fibres, and Dusts: Volume 100C, A Review of Human Carcinogens (2012) (Chromium).

8. Attached hereto as Exhibit 6 is a true and correct copy of relevant excerpts of IARC Monograph on Cobalt in Hard Metals and Cobalt Sulfate, Gallium Arsenide, Indium Phosphide and Vanadium Pentoxide: Volume 86 (2006).

9. Attached hereto as Exhibit 7 is a true and correct copy of JNJ 000237076.

10. Attached hereto as Exhibit 8 is a true and correct copy of IMERYS 342524.

11. Attached hereto as Exhibit 9 is a true and correct copy of the Deposition of Julie Pier, taken on September 12-13, 2018.

12. Attached hereto as Exhibit 10 is a true and correct copy of the

November 16, 2018 Expert Report of Robert Cook, Ph.D.

13. Attached hereto as Exhibit 11 is a true and correct copy of the November 16, 2018 Expert Report of Mark Krekeler, Ph.D.

14. Attached hereto as Exhibit 12 is a true and correct copy of November 12, 2018 Expert Report of Michael M. Crowley, Ph.D.

15. Attached hereto as Exhibit 13 is a true and correct copy of Agents Classified by the *IARC Monographs*, Volumes 1-123.

16. Attached hereto as Exhibit 14 is a true and correct copy of the Deposition of Laura Plunkett, taken on December 19, 2018.

17. Attached hereto as Exhibit 15 is a true and correct copy of the November 16, 2018 Expert Report of Arch Carson, M.D., Ph.D.

18. Attached hereto as Exhibit 16 is a true and correct copy of the May 28, 2024 Expert Report of Daniel L. Clarke-Pearson, M.D.

19. Attached hereto as Exhibit 17 is a true and correct copy of the May 28, 2024 Expert Report of Michele L. Cote, Ph.D., M.P.H.

20. Attached hereto as Exhibit 18 is a true and correct copy of November 15, 2018 Expert Report of Sarah E. Kane, M.D.

21. Attached hereto as Exhibit 19 is a true and correct copy of May 28, 2024 Second Amended Expert Report of Shawn Levy, Ph.D. **(REDACTED TO REMOVE CASE-SPECIFIC CONFIDENTIAL MEDICAL INFORMATION)**

22. Attached hereto as Exhibit 20 is a true and correct copy of the May 28, 2024 Expert Report of Anne McTiernan, M.D., Ph.D.

23. Attached hereto as Exhibit 21 is a true and correct copy of the November 16, 2018 Expert Report of Patricia G. Moorman, MSPH, Ph.D.

24. Attached hereto as Exhibit 22 is a true and correct copy of the May 27, 2024 Expert Report of Jack Siemiatycki, MSc, Ph.D.

25. Attached hereto as Exhibit 23 is a true and correct copy of the November 16, 2018 Expert Report of Sonal Singh, M.D., MPH.

26. Attached hereto as Exhibit 24 is a true and correct copy of the November 16, 2018 Expert Report of Ellen Blair Smith, M.D.

27. Attached hereto as Exhibit 25 is a true and correct copy of the May 28, 2024 Third Amended Expert Report of Rebecca Smith-Bindman, M.D.

28. Attached hereto as Exhibit 26 is a true and correct copy of May 28, 2024 Expert Report of Judith Wolf, M.D.

29. Attached hereto as Exhibit 27 is a true and correct copy of the Deposition of Mark Krekeler, Ph.D., taken on January 25, 2019.

30. Attached hereto as Exhibit 28 is a true and correct copy of the Deposition of Robert Cook, Ph.D., taken on January 30, 2019.

31. Attached hereto as Exhibit 29 is a true and correct copy of the November 15, 2023 Amended Expert Report of William Sage, M.D., J.D.

32. Attached hereto as Exhibit 30 is a true and correct copy of The Agency for Toxic Substances and Disease Registry (ATSDR) Toxicological Profile for Nickel (August 2005).

33. Attached hereto as Exhibit 31 is a true and correct copy of relevant excerpts of The Agency for Toxic Substances and Disease Registry (ATSDR) Toxicological Profile for Chromium (September 2012).

34. Attached hereto as Exhibit 32 is a true and correct copy of relevant excerpts of The Agency for Toxic Substances and Disease Registry (ATSDR) Toxicological Profile for Cobalt (April 2004).

35. Attached hereto as Exhibit 33 is a true and correct copy of relevant excerpts from the National Toxicology Program (NTP), 15th Report on Carcinogens (2021).

36. Attached hereto as Exhibit 34 is a true and correct copy of JNJ 000131754.

37. Attached hereto as Exhibit 35 is a true and correct copy of JNJ 000378046.

38. Attached hereto as Exhibit 36 is a true and correct copy of Oze, C., Bird, D.K., Fendorf, S. Genesis of hexavalent chromium from natural sources in soil and groundwater. PNAS. April 2007; 104(16):6544-6549.

39. Attached hereto as Exhibit 37 is a true and correct copy of IMERYS

469483.

40. Attached hereto as Exhibit 38 is a true and correct copy of IMERYS

441340.

41. Attached hereto as Exhibit 39 is a true and correct copy of JNJ

000246437.

42. Attached hereto as Exhibit 40 is a true and correct copy of the
Deposition of Donald Hicks, taken on June 28, 2018.

43. Attached hereto as Exhibit 41 is a true and correct copy of relevant
excerpts of USEPA 2000 “Supplementary Guidance for Conducting Health Risk
Assessment of Chemical Mixtures,” 2000 at Appendix A, A-1.

<https://cfpub.epa.gov/ncea/risk/recordisplay.cfm?deid=20533> (last accessed May 23,
2019).

44. Attached hereto as Exhibit 42 is a true and correct copy of Hill, A.B.,
The Environment and Disease. Proc R Soc Med; 1965, 58(5):295-300.

45. Attached hereto as Exhibit 43 is a true and correct copy of Weed, D.L.
and Hursting, S.D. Biologic Plausibility in Causal Inference: Current Method and
Practice. Am J Epidemiology; 1998, 147(5): 415-425.

46. Attached hereto as Exhibit 44 is a true and correct copy of Golden, R.,
Pyatt, D., Shields, P.G. Formaldehyde as a Potential Human Leukemogen: An
Assessment of Biological Plausibility. Crit Rev Toxicology; 2006, 36(2):135-153.

47. Attached hereto as Exhibit 45 is a true and correct copy of Dailey, J., Rosman, L., Silbergeld, E.K. Evaluating Biological Plausibility in Supporting Evidence for Action through Systematic Reviews in Public Health. Public Health. 2018; 165:48-57.

48. Attached hereto as Exhibit 46 is a true and correct copy of the Deposition of Arch I. Carson, M.D., Ph.D., taken on January 19, 2019.

49. Attached hereto as Exhibit 47 is a true and correct copy of Deposition of Shawn Levy, Ph.D., taken on January 11, 2019.

50. Attached hereto as Exhibit 48 is a true and correct copy of the Deposition of Michael Crowley, Ph. D., taken on January 4, 2019.

51. Attached hereto as Exhibit 49 is a true and correct copy of Cosmetic Ingredient Review, *Final Report on the Safety Assessment of Sodium p-Chloro-m-Cresol, p-Chloro-m-Cresol, Chlorothymol, Mixed Cresols, m-Cresol, o-Cresol, p-Cresol, Isopropyl Cresols, Thymol, o-Cymen-5-ol, and Carvacrol*, 25 Int'l J. Toxicology 29 (2006).

52. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

Dated: August 22, 2024

s/ Michelle A. Parfitt

Michelle A. Parfitt